



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

**MURIEL GOODE-TRUFANT**  
*Acting Corporation Counsel*

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 415  
New York, New York 10007

Defendant's request for an adjournment *sine die* of all summary-judgment briefing deadlines is DENIED. Defendant's alternative request for an extension of summary-judgment briefing deadlines is GRANTED. Defendant's motion for summary judgment is due February 7, 2025. Plaintiff's opposition and any cross-motion for summary judgment are due April 8, 2025. Defendant's reply in support of its motion and opposition to Plaintiff's motion shall be due May 8, 2025. Plaintiff's reply in support of her cross-motion is due June 9, 2025.

12/6/2024

**SO ORDERED:**

  
**HON. VERNON S. BRODERICK**  
**UNITED STATES DISTRICT JUDGE**

Re: *Humphreys v. N.Y.C. Health & Hosps. Corp.*  
16-cv-9707 (VSB) (SN)

Dear Judge Broderick:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, representing the Defendant NYC Health + Hospitals in the above-referenced action. I write to respectfully request that Your Honor adjourn *sine die* the deadlines associated with the parties' forthcoming motion and cross-motion for summary judgment, with the deadlines set once Plaintiff's new forthcoming motion, as described below, is fully submitted and resolved.

In the alternative, I respectfully request that Your Honor extend the deadlines associated for any summary judgment motions as set forth herein: Defendant's motion for summary judgment due February 7, 2025; Plaintiff's opposition to Defendant's motion and her own cross-motion for summary judgment due April 8, 2025; Defendant's reply on its own motion and opposition to Plaintiff's cross-motion due May 8, 2025; and Plaintiff's reply on her cross-motion due June 9, 2025. Currently, moving papers are due December 9, 2024; opposition papers are due December 23, 2024; and reply papers are due January 6, 2025. Specifically, Plaintiff requests that instead of having to file her own motion for summary judgment at the same time Defendant files its own motion for summary judgment, she be permitted to make a cross-motion for summary judgment at the same time she files her opposition to Defendant's motion, which she was permitted to do previously. *See* ECF No. 157. This is the fifth request for an extension of the deadlines associated with dispositive motions; the Court granted the four previous requests. Plaintiff consents to these adjournment and extension requests.

The request to indefinitely adjourn the summary judgment deadlines stems from Plaintiff advising the undersigned that she intends to file and serve another letter and another motion, although she refused to disclose, for alleged strategic reasons, what kind of letter or motion she intends to file or what relief she will seek. But Plaintiff claims that her forthcoming letter and motion may be dispositive before summary judgment, and the parties respectfully do not wish to invest time and resources into summary judgment motions that may not even be decided.

Should the Court not adjourn the deadlines *sine die*, the requested extensions would allow the undersigned to fully set forth the facts and Defendant's arguments in support of its forthcoming motion for summary judgment. I have an administrative trial on December 4 and 5, 2024, in addition to discovery deadlines in other cases and other impending filing deadlines, including an opposition to a motion to amend a complaint, an answer to a complaint, and a motion for summary judgment in another action in this Court. The requested extension would allow me sufficient time to complete Defendant's Rule 56.1 Statement and its memorandum of law and would allow Plaintiff sufficient time to complete her new motion, oppose Defendant's motion, and write her own cross-motion.

I thank the Court for its consideration and attention to this matter.

Respectfully submitted,



Steven E. Smith  
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)

cc: Chantelle A.E. Humphreys (via First Class Mail and Email)  
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